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Attorneys for Defendant,
SUTTER HEALTH and
SUTTER MEDICAL CENTER OF SANTA ROSA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VALERIE GEORGE, as Administrator and Personal Representative of THE ESTATE OF RYAN GEORGE; VALERIE GEORGE) and TAJMAH BEAUCHAMP, as Legal Representatives for Jaida George and Ryan) George, Jr.; VALERIE GEORGE,) Individually; DONALD GEORGE; and) TAJMAH BEAUCHAMP, Individually,)

CASE NO.: 3:08-cv-02675-EDL

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND THE TIME TO FILE AN ADR
CERTIFICATION AND TO SELECT AN
ADR PROCESS**

Plaintiffs,

V.

SONOMA COUNTY SHERIFF'S
DEPARTMENT; BILL COGBILL;)
COUNTY OF SONOMA; CALIFORNIA)
FORENSIC MEDICAL GROUP, INC;)
JAMES LUDERS, M.D.; MICHAEL E.)
DAGEY, R.N.; SUTTER HEALTH;)
SUTTER MEDICAL CENTER OF SANTA)
ROSA; EDWARD W. HARD, M.D.;)
RICHARD FLINDERS, M.D.; JOSEPH N.)
MATEL, M.D.; NORICK JANIAN, M.D.;)
and DOES 1 through 25, inclusive.)

Defendants.

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**SUBJECT TO THE APPROVAL OF THE COURT, THE PARTIES THROUGH
THEIR RESPECTIVE COUNSEL OF RECORD AGREE AS FOLLOWS:**

WHEREAS:

1. Counsel have met and conferred regarding selection of an ADR process.
 2. The Amended Complaint names as additional defendants Edward W. Hard, M.D., Richard Flinders, M.D., Joseph N. Matel, M.D. and Norick Janian, M.D.
 3. It is premature to select an ADR process in the absence of these additional defendants.
 4. The initial case management conference has been continued to December 16, 2008.

IT IS HEREBY STIPULATED:

That the filing and service of the ADR Certification and either a Stipulation and [Proposed] Order Selecting an ADR Process or a Notice of Need for ADR Phone Conference will be due no later than November 26, 2008.

Dated: October 7, 2008

LA FOLLETTE, JOHNSON, DE HAAS,
FESLER & AMES

By: _____ /s/ _____
LARRY THORNTON, ESQ.
Attorneys for Defendants SUTTER HEALTH
and SUTTER MEDICAL CENTER OF
SANTA ROSA

Dated: October 7, 2008

TRIMBLE, SHERINIAN & VARANINI

By: _____ /s/ _____
JEROME M. VARANINI, ESQ.
Attorneys for Defendants CALIFORNIA
FORENSIC MEDICAL GROUP, INC.,
JAMES LUDERS, M.D. and MICHAEL
DAGEY, R.N.

III

1 Dated: October 7, 2008

SPAUULDING McCULLOUGH & TANSIL, LLP

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By: _____/s/_____

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TERRY S. STERLING, ESQ.
5 Attorneys for Defendants SONOMA
COUNTY SHERIFF'S DEPARTMENT,
BILL COGBILL and COUNTY OF
SONOMA

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8 Dated: October 7, 2008

SANFORD WITTELS & HEISLER, LLP

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By: _____/s/_____

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STEVEN WITTELS, ESQ.
Attorneys for PLAINTIFFS

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PROPOSED ORDER

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PURSUANT TO STIPULATION, IT IS SO ORDERED that the filing and service of
the ADR Certification and either a Stipulation and [Proposed] Order Selecting an ADR Process
or a Notice of Need for ADR Phone Conference will be due no later than November 26, 2008.

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Dated: October 8, 2008

